

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #5
Progress
Warren Steel Holdings
C5AV
Warren, OH
Latitude: 41.2629796 Longitude: -80.7990185

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From: Stephen Wolfe, OSC
Date: 5/11/2018
Reporting Period: 05/07/2018 through 05/11/2018

1. Introduction

1.1 Background

Site Number:	C5AV	Contract Number:	
D.O. Number:		Action Memo Date:	2/20/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/24/2018	Start Date:	4/24/2018
Demob Date:		Completion Date:	
CERCLIS ID:	OH0011207	RCRIS ID:	OHD066060608
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

2.1.2 Response Actions to Date

On Monday, May 7, 2018 ERRS continued to collect drums and other containers from the site.

On Tuesday, May 8, 2018, ERRS continued to collect drums and other containers from the site. ERRS initiated hazardous categorization activities on collected samples. EPA and ERRS met with a company representatives that historically provided environmental consulting work for the previous facility owners. The representatives showed EPA where a vacuum truck was located that contained K061 waste that EPA did not know about.

On Wednesday May 9, 2018, ERRS continued to collect drums and other containers from the site. ERRS completed Hazardous Categorization testing of all collected samples. A representative from the electrical company was on site to look at substations to assist in determining whether or not they were de-energized. 1 Large substation was confirmed to be de-energized, several smaller ones located throughout the site were not able to be determined.

On Thursday May 10, 2018, ERRS continued to collect drums and other containers from the site. EPA and ERRS met with a local company whose name was on some of the "super sacks" of material. The company indicated a majority of the material was beyond its shelf life and would not be able to be re-used. They visited the site and identified some material that they may be able to re-use. EPA and ERRS RM performed final walk-throughs of several buildings to ensure all items were removed from the building. ERRS began bulking the neutral liquids and waste petroleum products for disposal.

On Friday, May 11, 2018, ERRS continued to collect drums and other containers from the site. ERRS continued to bulk neutral liquids and waste petroleum material into larger containers for disposal. A larger forklift was delivered to site in order to move the containers that were too heavy for equipment on site. The forklift will also be used to remove drums from shelving in the warehouse building once an opening is cut in the door. EPA, ERRS RM and START continued performing final walk throughs of buildings to ensure all material has been removed and restaged for disposal. ERRS replaced sorbent material on thin layers of oil in some of the sites machine pits.

To date an estimated 75 drums and 50 totes full of material have been gathered for disposal. Numerous other smaller containers are being bulked into larger containers for disposal. Approximately 40 cylinders (oxygen, acetylene, hydrogen, propane) have been gathered and there are approximately 200 fire extinguishers located on site that will be gathered for disposal. Approximately 100 empty containers have also been gathered and will be cut apart for disposal. There are an estimated 120 transformers on site that require sampling (pcb analysis).

Daily air monitoring (particulate) is being performed by START in dusty areas. Acid gas monitoring and general air monitoring (MultiRAE) is being performed during drum/container sampling.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Continue gathering all drums and containers, sample/profile and dispose
Investigate transformers
Investigate options for containerized K061 wastes
complete final checks of all buildings

2.2.1.1 Planned Response Activities

gather/sample/dispose of hazardous materials located in drums/totes and other containers throughout the site
investigate (sample for pcbs) and drain transformers located on site

2.2.1.2 Next Steps

Receive bids for subcontracted transformer sampling (~100)
Coordinate with two environmental companies who own equipment filled with K061 waste on site.

2.2.2 Issues

2.3 Logistics Section

ERRS provided all logistics for the site

2.4 Finance Section

2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery issue was issued to ERRS for \$300,000 to begin response actions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$300,000.00	\$122,000.00	\$178,000.00	59.33%
TAT/START	\$33,850.00	\$12,000.00	\$21,850.00	64.55%
Intramural Costs				
Total Site Costs	\$333,850.00	\$134,000.00	\$199,850.00	59.86%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day.

2.5.2 Liaison Officer

OSC Steve Wolfe

2.5.3 Information Officer

OSC Steve Wolfe

3. Participating Entities

3.1 Unified Command

OSC Steve Wolfe

3.2 Cooperating Agencies

OSC Steve Wolfe

4. Personnel On Site

1 EPA
1 START
7 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report
response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

NCP and CERCLA.